



California Regional Water Quality Control Board

Santa Ana Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

September 18, 2006

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

**COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN (FIELD SAMPLING/
QUALITY ASSURANCE PROJECT PLANS), SITE VERIFICATION ACTIVITIES AT
FORMER TANK FARM 555 FACILITY, FORMER TANK FARM 5, FORMER JP5
TRUCK FUELING AREA, AND MSC JP5 BUILDING 658 STUDY AREA, FORMER
MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID:
T0605900619, DOD100171600, & T06059964530**

Dear Mr. Newton:

We have reviewed the above referenced document, dated May 2006, which we received on July 21, 2006. We have the following comments:

- **4.1.1 Soil Sampling Locations, Former Tank Farm Facility**, paragraph following the table, Page 4-2: You have proposed the U.S. EPA Preliminary Remediation Goals (PRGs) as the remedialtion goals for this and other petroleum corrective action sites at the base. PRGs are based upon assessment of the threat to human healath and are normally applied to the ground surface down to a depth of two feet. Petroleum release sites that are overseen by the Regional Board, such as releases from fuel storage tanks and underground pipelines, are assessed for corrective or remedial action with respect to protection of human health, ecological receptors, impacts to water quality, and all designated beneficial uses of surface water and groundwater. Please note that the PRGs are typically not as stringent as the appropriate site specific corrective action goals for protection of beneficial uses at petroleum hydrocarbon or fuel release sites. If corrective action goals are necessary for the above identified site they should be protective of applicable beneficial uses.

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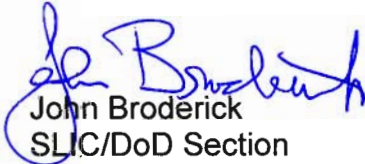
Mr. Darren Newton

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For any questions, please call me at (951) 782-4494, or send email to ibroderick@waterboards.ca.gov.

Sincerely,


John Broderick
SLIC/DoD Section

cc via email: Richard Muza, U.S. EPA, Region 9
Soad Hakim, DTSC, Office of Military Facilities
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